

10.2.e

Van: 10.2.e
Verzonden: woensdag 20 mei 2020 14:43
Aan: 10.2.e Pappie, drs. D. (David) 10.2.e@gmail.com
Onderwerp: RE: [EXTERNAL]: RE: Pj Amsterdam Webex EZK / Lazard / Advisors; preliminary Dutch tax input
Bijlagen: Strikt vertrouwelijk_memo MEZK opties Amsterdam 2005.docx

Hi 10. ,

Dank. Nav onderstaande analyse heb ik in de nota een voorbehoud opgenomen dat nadere due diligence nodig is, waar we deze vraag dan in mee moeten nemen. Met WJZ zo ook besproken. Zie bijgevoegd het definitieve stuk, dat ik nu ook breder zal rondsturen.

Groeten 10.
2

Van: 10.2.e
Verzonden: woensdag 20 mei 2020 14:33
Aan: 10.2.e@gmail.com
Onderwerp: FW: [EXTERNAL]: RE: Pj Amsterdam Webex EZK / Lazard / Advisors; preliminary Dutch tax input

Allen,

Ik reageer ook even in de kleine groep op onderstaande mail van Houthoff over de belastingssituatie.

11.1

11.1

Groet,
10.
2 e

From: 10.2.e @houthoff.com]
Sent: woensdag 20 mei 2020 14:25
To: 10.2.e @lazard.com>; 10.2.e @lazard.com>; 10.2.e @lazard.com>; 10.2.e @minezk.nl; 10.2.e @minezk.nl; 10.2.e @minezk.nl; 10.2.e @minfin.nl; 10.2.e @gmail.com; 10.2.e @msn.com; 10.2.e @kpmg.nl>; 10.2.e @minfin.nl>; 10.2.e @minezk.nl;
 10.2.e @minezk.nl
Cc: 10.2.e @houthoff.com>; 10.2.e @houthoff.com>; 10.2.e @houthoff.com>; 10.2.e @houthoff.com>; 10.2.e @houthoff.com>
Subject: RE: [EXTERNAL]: RE: Pj Amsterdam Webex EZK / Lazard / Advisors; preliminary Dutch tax input

All,

We reviewed the Project Arise (i.e., Project Amsterdam) tax discussion paper as prepared by 10.1.c; 10.2.g dated 19 May 2020 (the **Paper**). The Paper identifies two main tax concerns;

1. 10.1.c; 10.2.g

11.1 [Redacted]

[Redacted]

- 10.1.c; 10.2.g [Redacted] 11.1 [Redacted]

- 11.1 [Redacted]

Ad 2)

- 11.1 [Redacted]
- 10.1.c; 10.2.g [Redacted] 11.1 [Redacted]

General

- 11.1 [Redacted]

We hope this is helpful but please let us know if you would like to discuss in more detail.

Best regards,

10.2.e

HOUTHOFF

10.2.e

TAX LAWYER | PARTNER

T 10.2.e

M 10.2.e

F 10.2.e @houthoff.com

www.houthoff.com

From: 10.2.e @lazard.com>

Sent: woensdag 20 mei 2020 11:00

To: 10.2.e @houthoff.com>; 10.2.e @lazard.com>; 10.2.e @minezk.nl;

10.2.e @minezk.nl; 10.2.e @minfin.nl; 10.2.e @gmail.com; 10.2.e @msn.com;

10.2.e @kpmg.nl; 10.2.e @minfin.nl>; 10.2.e @minezk.nl;

10.2.e @minezk.nl; 10.2.e @houthoff.com>; 10.2.e @houthoff.com>

10.2.e @houthoff.com>; 10.2.e @houthoff.com>

Cc: 10.2.e @houthoff.com>

Subject: RE: [EXTERNAL]: RE: Pj Amsterdam Webex EZK / Lazard / Advisors

That is correct – I have asked for it.

10.2.e

LAZARD

P: 10.2.e

M: 10.2.e

From: 10.2.e @houthoff.com>

Sent: 20 May 2020 10:52

To: 10.2.e @lazard.com>; 10.2.e @lazard.com>; 10.2.e @minezk.nl;

10.2.e @minezk.nl; 10.2.e @minfin.nl; 10.2.e @gmail.com; 10.2.e @msn.com;

10.2.e @kpmg.nl; 10.2.e @minfin.nl>; 10.2.e @minezk.nl;

10.2.e @minezk.nl; 10.2.e @houthoff.com>; 10.2.e @houthoff.com>

10.2.e @houthoff.com>; 10.2.e @houthoff.com>

Cc: 10.2.e @houthoff.com>

Subject: [EXTERNAL]: RE: Pj Amsterdam Webex EZK / Lazard / Advisors

10.2.e,

I am correct that we do not have a copy of the 10.1.c; 10.2.g memo that 10.1.c; 10.2.g refers to in its memorandum; correct?

Best,

10.2.e

HOUTHOFF

10.2.e

ADVOCaat | PARTNER

T 10.2.e

T 10.2.e (assistant)
M 10.2.e
E 10.2.e @houthoff.com
www.houthoff.com

From: 10.2.e @lazard.com>
Sent: dinsdag 19 mei 2020 22:40
To: 10.2.e @lazard.com>; 10.2.e @lazard.com>;
10.2.e @minezk.nl; 10.2.e @minezk.nl; 10.2.e @minezk.nl; 10.2.e @minfin.nl;
10.2.e @gmail.com; 10.2.e @msn.com; 10.2.e @kpmg.nl; 10.2.e
@minfin.nl>; 10.2.e @minezk.nl; 10.2.e @minezk.nl; 10.2.e
@houthoff.com>; 10.2.e @houthoff.com>; 10.2.e
@houthoff.com>; 10.2.e @houthoff.com>

Subject: RE: Pj Amsterdam Webex EZK / Lazard / Advisors

Dear all,

As you know, we followed up with Amsterdam this morning regarding the tax issue.
This evening we spoke to GS and in parallel received the attached document from the Company.

From the conversation with GS:

- Discussion on tax is an ongoing theme, but not the biggest one on their agenda at the moment
- 10.1.c; 10.2.g
- 10.1.c; 10.2.g
- We explained to them that it is relevant for us from the perspective of understanding (i) what it will take to get a deal done and (ii) requirement to have a sustainable balance sheet – they understand that
- 10.1.c; 10.2.g

11.1

Happy to discuss first thing tomorrow how we would want to go about that.

Finally, we are attaching a slight update this mornings deck with the following changes:

11.1

Regards,

10.2.e
LAZARD
P: 10.2.e
M: 10.2.e

From: 10.2.e @lazard.com>
Sent: 19 May 2020 00:47

To: 10.2.e [redacted]@lazard.com>; 10.2.e [redacted]@minezk.nl; 10.2.e [redacted]@minezk.nl;
10.2.e [redacted]@minezk.nl; 10.2.e [redacted]@minfin.nl; 10.2.e [redacted]@gmail.com; 10.2.e [redacted]@msn.com;
10.2.e [redacted]@kpmg.nl; 10.2.e [redacted]@minfin.nl>; 10.2.e [redacted]@minezk.nl;
10.2.e [redacted]@minezk.nl; 10.2.e [redacted]@houthoff.com; 10.2.e [redacted]@houthoff.com>; 10.2.e [redacted]@houthoff.com>; 10.2.e [redacted]@houthoff.com>

Subject: RE: Pj Amsterdam Webex EZK / Lazard / Advisors

Dear all,

Following this morning's call, and subsequent conversations with many of you, we've updated the presentation to reflect the different inputs and discussions.

Please find attached the latest version for discussion on tomorrow's call at 8.30 NL time.




Kind regards,

10.2.e
[redacted]

LAZARD

Mondriaan Tower 28th Floor
Amstelplein 58
1096 BC Amsterdam

P: 10.2.e [redacted]
M: 10.2.e [redacted]

www.lazard.com |    

-----Original Appointment-----

From: 10.2.e [redacted]

Sent: 18 May 2020 22:08

To: 10.2.e [redacted]@minezk.nl; 10.2.e [redacted]@minezk.nl; 10.2.e [redacted]@minezk.nl;
10.2.e [redacted]@minfin.nl; 10.2.e [redacted]@gmail.com; 10.2.e [redacted]@msn.com; 10.2.e [redacted]@kpmg.nl; 10.2.e [redacted]@minezk.nl;
10.2.e [redacted]@minezk.nl; 10.2.e [redacted]@minezk.nl; 10.2.e [redacted]@houthoff.com; 10.2.e [redacted]

Cc: 10.2.e [redacted]

Subject: Pj Amsterdam Webex EZK / Lazard / Advisors

When: 19 May 2020 08:30-09:30 (UTC+01:00) Amsterdam, Berlin, Bern, Rome, Stockholm, Vienna.

Where: Webex details below

-- Do not delete or change any of the following text. --

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